



261 Madison Avenue, 26th Floor
New York, New York 10016

445 South Figueroa Street, Suite 3100
Los Angeles, California 90071

(212) 972-7040 (o) • (212) 922-1939 (f)
www.FSFLLP.com

DANIEL J. SCHNEIDER*, PARTNER
DSCHNEIDER@FSFLLP.COM

January 31, 2024

Via ECF

Hon. Kiyo A. Matsumoto, U.S.D.J.
United States District Court, E.D.N.Y.
225 Cadman Plaza East, Courtroom 6C-S
Brooklyn, New York 11201

Re: Letter Motion for Leave to File Excess Pages (16-page Reply Brief)
Case No.: 1:22-cv-05686-KAM-VMS—*Lanasa, et al. v. Stiene*
Client No: 1367-1001

Dear Judge Matsumoto:

This office represents the defendant Erik Stiene (“Defendant” or “Mr. Stiene”) in the referenced case. This letter is to respectfully request, pursuant to Rule III(C)(2) of Your Honor’s individual rules of practice, for an enlargement of the number of pages permitted in our reply brief in connection with our motion to dismiss the Second Amended Complaint (“SAC”) in this action, from 10 pages to 16 pages.

On May 2, 2022, we made a similar application for excess pages (the “FAC Enlargement App.”) in connection with our motion to dismiss (the “First Motion”) the First Amended Complaint (“FAC”) in this action. ECF 30. On May 3, 2023, the application was granted. We ask that the Court grant similar relief for largely the same reasons set forth in the FAC Enlargement App., *id.*, which, for the sake of brevity, we ask that it be incorporated by reference herein, except we are asking for one additional page.

The justification for the additional page is that while the opposition of Plaintiff, Justin Lanasa (“Plaintiff”) makes similar arguments to those set forth in the First Motion, he has added a declaration of his client, several exhibits (including the verdict sheet from *Carrol v. Trump*, S.D.N.Y. 22-cv-10016(LAK), which is somehow germane), and additional arguments necessitated by the changes in the SAC. Additional space is requested to attempt to fully respond to his claims with respect to his ability to add an additional party and his intent to request an additional summons at this stage.

*Licensed in New York, California,
Illinois and Massachusetts

FARBER SCHNEIDER FERRARI LLP

Hon. Kiyo A. Matsumoto, U.S.D.J.

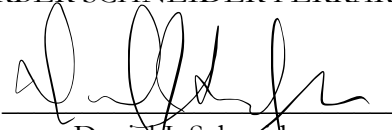
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As discussed in our prior letter, which we hope this Court will continue to be receptive to, the additional pages will hopefully be sufficient to provide the Court with the context necessary to decide this motion. We appreciate the Court's courtesy and consideration on this matter.

Respectfully submitted,

FARBER SCHNEIDER FERRARI LLP

By: 
Daniel J. Schneider

cc: All counsel via ECF